

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE UNITED STATES
CONFERENCE OF MAYORS;

DEEDEE CORRADINI
MAYOR OF SALT LAKE CITY, UT.,
and PRESIDENT OF THE UNITED
STATES CONFERENCE
OF MAYORS;

VICTOR ASHE.
MAYOR OF KNOXVILLE, TN.;

NATIONAL ASSOCIATION OF
COUNTIES;

BETTY LOU WARD,
COUNTY COMMISSIONER,
WAKE COUNTY, NC., and
PRESIDENT OF THE NATIONAL
ASSOCIATION OF COUNTIES; and

RANDY JOHNSON,
CHAIR, HENNEPIN COUNTY, MN.,
BOARD OF COMMISSIONERS,

Individually and on behalf of all others
similarly situated;

Plaintiffs.

vs.

ADVISORY COMMISSION ON
ELECTRONIC COMMERCE, and

JAMES BARKSDALE,
JOHN SIDGMORE,
STAN SOKUL,
ROBERT PITTMAN,
TED WAITT,
MICHAEL ARMSTRONG,
DAVID POTTRUCK,

CIVIL ACTION NO. 99-

COMPLAINT IN EQUITY
CLASS ACTION

Lou Ward, County Commissioner, Wake County, North Carolina, and President of the National Association of Counties; and Randy Johnson, Chair, Hennepin County, Minnesota, Board of Commissioners (collectively "Plaintiffs"), on behalf of themselves and all others similarly situated (the "Class") complain against defendants, the Advisory Commission on Electronic Commerce, and Appointees to the Advisory Commission on Electronic Commerce James Barksdale, John Sidgmore, Stan Sokul, Robert Pittman, Ted Waitt, Michael Armstrong, David Pottruck, Richard Parsons, Grover Norquist and Gene Leburn, in their capacities as appointees, as follows:

NATURE OF ACTION

I. This action is brought against the Advisory Commission on Electronic Commerce (hereinafter "the Commission") and ten of its appointees, by the United States Conference of

WHEREFORE, plaintiffs request the following relief:

1. Declaratory Judgment for plaintiffs and the Class against all defendants declaring that the Commission was improperly constituted under the Act;
2. Judgment for plaintiffs and the Class against all defendants enjoining them from convening and/or taking any action until the Commission is properly constituted,
3. Judgment for plaintiffs and the Class for costs incurred herein, including attorneys' fees to the extent allowed by law;
4. For such other and further relief as the Court deems just and proper.

Respectfully submitted,

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DATE: March 8, 1999

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